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11 UNITED STATES DISTRICT COURT
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13 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION
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15 MORTGAGE ELECTRONIC
16 REGISTRATION SYSTEM, INC.
17 MERSCORP HOLDINGS, INC.,
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19 Plaintiffs,
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21 v.
22

23 DANIEL W. ROBINSON, DARLA J.
24 ROBINSON,
25

26 Defendants.
27
28

Case # 2:13-cv-07142-PSG-AS
Honorable Phillip S. Gutierrez

**DECLARATION OF JOHN
MURRIN IN SUPPORT OF
DEFENDANTS' POINTS AND
AUTHORITIES IN SUPPORT OF
MOTION FOR SUMMARY
JUDGMENT, OR IN THE
ALTERNATIVE FOR PARTIAL
SUMMARY JUDGMENT**

Date: March 2, 2015
Time: 1:30 p.m.
Dept. Roybal Building, 880

Complaint Filed: 9/26/14

DECLARATION OF J. OWEN MURRIN

I, the undersigned, J. Owen Murrin, am an attorney at law, duly licensed to practice before the courts of the State of California. The undersigned is the founding member of the Murrin Law Firm, attorney of record for Daniel and Darla Robinson in the above-entitled action. The undersigned states the following based upon personal knowledge and/or knowledge of the record. The undersigned can competently testify either from first hand personal knowledge or from firsthand knowledge of the record under penalty of perjury under the laws of the United States as follows:

1. On December 19, 2014 I engaged in a meet and confer with opposing counsel precatory to bring this Summary Judgment motion. In addition to attempting to resolve this case, we discussed the Summary Judgment Motions and I inquired of opposing counsel whether his clients would want more time to conduct more discovery, or whether they wanted to take the clients deposition. Opposing counsel said no.

2. Attached hereto as Exhibit "10" is a true and correct copy of the Deed of Trust for the Subject Property

3. Attached hereto as Exhibit "47" is a true and correct copy of the Promissory Note for the Subject Property that was recorded in 2005.

4. Attached hereto as Exhibit "48" is a true and correct copy of the Trademark file as obtained from the public record on file on the web from the US Patent and Trademark office (the file has been thinned down).

4a. Attached hereto as Exhibit "51" is a true and correct copy of Designation of Foreign Corp-MERSCORP

5. Attached hereto as Exhibit "52" is a true and correct copy of the MERS Systems Rules of Membership for 2013.

6. Attached hereto as Exhibit "60" is a true and correct copy of the MERS "Electronic Tracking Agreements" for "Whole Loan Sales."

7. Attached hereto as Exhibit "61" is a true and correct copy of the MERS "Electronic Tracking Agreements" for "Warehousing".

8. Attached hereto as Exhibit "62" is a true and correct copy of the MERS "Electronic Tracking Agreements" for "Gestation",

9. Attached hereto as Exhibit “63” is a true and correct copy of MERSCORP’s response to request for admissions in answers to 39-40, with front and back pages.

10. Attached hereto as Exhibit “64” is Statement and Designation by Foreign Corporation, Mortgage Electronic Reg. Systems, Inc.

11. Attached hereto as Exhibit “65” is a true and correct copy of MERS® System Rules of Membership from Plaintiffs’ Responses to Request for Production of Documents. Page 4.

I declare under the penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Dated this 12th day of January, 2015

/s/

John Murrin, Declarant

**TABLE OF CONTENTS OF EXHIBITS FOR DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

Exhibit 10	Deed of Trust
Exhibit 47	Note dated February 7, 2005
Exhibit 48	MERS Trademark Documents (thinned down)
Exhibit 51	Designation of Foreign Corp-MERSCORP
Exhibit 52	MERS® System Rules of Membership dated March 18, 2013
Exhibit 60	Electronic Tracking Agreement for Whole Loan Sale Agreement
Exhibit 61	Electronic Tracking Agreement for Warehouse Lender
Exhibit 62	Electronic Tracking Agreement for Gestation
Exhibit 63	Answers to RFA MERSCORP Admit having no legal interest, no beneficial interest or any aging interest in the loan instrument, note or underlying security
Exhibit 64	Statement and Designation by Foreign Corporation, Mortgage Electronic Reg. Systems, Inc.
Exhibit 65	MERS System Rules of Membership from Responses to RFP